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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EURO PACIFIC CAPITAL INC, individually and in its
capacity as Investor Representative and attorney-in-fact
for BRUCE WALKER RAVENEL, et al.

Plaintiff,

- against -

BOHAI PHARMACEUTICALS GROUP, INC.

Defendant.

Case No. 15 Civ. 4410 (VM)

**NOTICE OF MOTION FOR
MOTION TO DISMISS AND
COMPEL ARBITRATION**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law and Declaration of Eugene Meyers and exhibits thereto, Defendant Bohai Pharmaceuticals Group, Inc., by and through its attorneys, Dacheng Law Offices LLP, will move this Court, before the Honorable Victor Marrero, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, on a date determined by the Court, for an Order staying this action, compelling arbitration and dismissing certain causes of action for failure to state a claim upon which relief may be granted.

Dated: September 29, 2015

DACHENG LAW OFFICES LLP

By: /s/ Eugene Meyers

Eugene Meyers

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Certificate of Service

The undersigned hereby certifies that on the 29th day of September, 2015, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

DACHENG LAW OFFICES, L.L.P.

By: /s/ Eugene Meyers
Eugene Meyers
*Attorneys for Bohai Pharmaceuticals
Group, Inc.*

